

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CHICAGO DIVISION

FILED  
1-11-2008  
JAN 11 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

vs.

Case No: 1:07-cv-6321

ANGEL FIGUEROA

Judge Wayne R. Andersen

**ANGEL FIGUEROA'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE REPLY TO GOVERNMENT'S RESPONSE TO  
MOTION FILED UNDER 28 U.S.C. § 2255**

COMES now, the Petitioner, ANGEL FIGUEROA, by and through his undersigned counsel, and moves this Honorable Court for an unopposed extension of time of thirty (30) days to file his reply to the government's response to his motion filed under 28 U.S.C. § 2255 from the current due date of January 11, 2008. In support of said motion, petitioner states as follows:

Undersigned counsel has spoken with Assistant United States Attorney Renato Mariotti regarding our request for production of the "first" motion and order on speedy trial. AUSA Mariotti indicated that he would be in trial through the 17<sup>th</sup> of January but would, once out of trial, review the file and determine if there is a "first" motion and "first" order, and if so, obtain authorization to release it to us.

Counsel also needs additional time in order to obtain affidavits in support of

petitioner's motion filed under 28 U.S.C. § 2255.

Counsel is requesting the thirty (30) additional days in order to give AUSA Renato Mariotti extra time after finishing his current trial to review the criminal file in this matter in order to respond to our request for production of the "first" motion and order on speedy trial and to obtain affidavits in support of the motion filed under 28 U.S.C. § 2255.

WHEREFORE, the petitioner, ANGEL FIGUEROA, respectfully requests that this Honorable Court grant this unopposed motion and extend the time for filing his reply to the government's response to his motion filed under 28 U.S.C. § 2255 for an additional thirty (30) days from the current due date of January 11, 2008.

Respectfully submitted,

THE LAW OFFICE OF  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing notice was served on Renato Mariotti, Office of the United States Attorney, 219 South Dearborn Street, Suite 500, Chicago, Illinois, 60604 and Scott Frankel, 77 W. Washington Street, Suite 1720, Chicago, Illinois, 60602 this the 10th day of January 2008.

*William Mallory Kent*

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William Mallory Kent